

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

United States of America

Plaintiff(s)

v.

CASE NUMBER: **3:20-MJ-0008-CLB****20CR000018**

1

JASON MACDONALD,
akas Brian Conn, Brandon Tartaglia, James R. Thomas

Defendant(s)

WARRANT FOR ARREST

TO: UNITED STATES MARSHAL AND ANY AUTHORIZED UNITED STATES OFFICER

YOU ARE HEREBY COMMANDED to arrest **JASON MACDONALD,**
akas Brian Conn, Brandon Tartaglia, James R. Thomas

and bring him/her forthwith to the nearest Magistrate Judge to answer a(n): ☐ Complaint ☒ Indictment
☐ Information ☐ Order of Court ☐ Probation Violation Petition ☐ Violation Notice

Charging him/her with: (ENTER DESCRIPTION OF OFFENSE BELOW)

18 U.S.C. § 1344(2): Bank Fraud and Attempted Bank Fraud;
18 U.S.C. § 641: Theft of Government Property Exceeding \$1,000

in violation of the following Title, United States Code, Section(s)
SEE ABOVE

Kiry K. Gray
NAME OF ISSUING OFFICER

Clerk of Court
TITLE OF ISSUING OFFICER

January 10, 2020 LOS ANGELES, CALIFORNIA
DATE AND LOCATION OF ISSUANCE

BY: STEVE KIM
NAME OF JUDICIAL OFFICER

RETURN

THIS WARRANT WAS RECEIVED AND EXECUTED WITH THE ARREST OF THE ABOVE-NAMED DEFENDANT AT (LOCATION):

DATE RECEIVED

DATE OF ARREST

DESCRIPTIVE INFORMATION FOR DEFENDANT
CONTAINED ON PAGE TWO

NAME OF ARRESTING OFFICER

TITLE

SIGNATURE OF ARRESTING OFFICER

WARRANT FOR ARREST

CR - 12 (07/04)

PAGE 1 OF 2

UNITED STATES DISTRICT COURT

FILED
2020 JAN 10 PM 3:22
CLERK U.S. DISTRICT COURT
CENTRAL DISTRICT OF CALIF.
LOS ANGELES

UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA

October 2019 Grand Jury

UNITED STATES OF AMERICA,

CR No. 20CR00018 -CJC

Plaintiff,

I N D I C T M E N T

v.

[18 U.S.C. § 1344(2): Bank Fraud
and Attempted Bank Fraud; 18
U.S.C. § 641: Theft of Government
Property Exceeding \$1,000]

JASON MACDONALD,
aka "Brian Conn,"
"Brandon Tartaglia," and
"James R. Thomas,"

Defendant.

The Grand Jury charges:

COUNTS ONE THROUGH SIX

[18 U.S.C. § 1344(2)]

A. INTRODUCTORY ALLEGATIONS

At times relevant to this Indictment:

1. Wells Fargo Bank, National Association ("Wells Fargo") was
a financial institution insured by the Federal Deposit Insurance
Corporation.

1 2. U.S. Bank National Association ("U.S. Bank") was a
2 financial institution insured by the Federal Deposit Insurance
3 Corporation.

4 B. SCHEME TO DEFRAUD

5 3. Beginning on an unknown date and continuing through at
6 least on or about September 4, 2018, in Los Angeles and San Luis
7 Obispo Counties, within the Central District of California, and
8 elsewhere, defendant JASON MACDONALD, also known as "Brian Conn,"
9 "Brandon Tartaglia," and "James R. Thomas," and others known and
10 unknown to the Grand Jury, knowingly and with the intent to defraud,
11 executed and attempted to execute a scheme to obtain moneys, funds,
12 credits, assets, and other property owned by and in the custody and
13 control of financial institutions, including Wells Fargo and U.S.
14 Bank, by means of materially false and fraudulent pretenses,
15 representations, and promises, and the concealment of material facts.

16 4. The fraudulent scheme was operated and was carried out, in
17 substance, in the following manner:

18 a. Defendant MACDONALD would obtain counterfeit checks
19 that bore invalid account numbers. The counterfeit checks purported
20 to draw on accounts at Wells Fargo, U.S. Bank, and other financial
21 institutions insured by the Federal Deposit Insurance Corporation.

22 b. Defendant MACDONALD would knowingly pass these
23 counterfeit checks to the United States Postal Service ("USPS") as
24 payment for valuable goods and services, including priority-mail
25 services and postage stamps.

26 c. By passing the counterfeit checks to USPS, defendant
27 MACDONALD caused USPS to pass and attempt to pass the counterfeit
28

1 checks to Wells Fargo, U.S. Bank, and other financial institutions
2 for payment.

3 d. By passing these counterfeit checks to USPS, defendant
4 MACDONALD falsely represented that he was authorized to request
5 disbursement of moneys and funds under the custody and control of
6 Wells Fargo, U.S. Bank, and other financial institutions, and
7 concealed that he was not authorized to request disbursement of those
8 moneys and funds. Defendant MACDONALD further attempted to
9 fraudulently induce Wells Fargo, U.S. Bank, and other financial
10 institutions to disburse funds to USPS.

11 5. In total, the fraudulent scheme carried out by defendant
12 MACDONALD and his co-schemers resulted in an intended loss of
13 approximately \$115,958.

14 C. EXECUTION OF THE FRAUDULENT SCHEME

15 6. On or about the following dates, in Los Angeles and San
16 Luis Obispo Counties, within the Central District of California, and
17 elsewhere, defendant MACDONALD committed the following acts, each of
18 which constituted an execution and attempted execution of the
19 fraudulent scheme:

COUNT	DATE	ACT
ONE	6/28/18	Presented to USPS as payment for goods and services a counterfeit check in the amount of approximately \$1,356.70 that purported to draw on a Wells Fargo account belonging to "J.R. Marketing, Inc./James R. Thomas" at a post office in Los Angeles, California.
TWO	7/2/18	Presented to USPS as payment for goods and services a counterfeit check in the amount of approximately \$1,006.70 that purported to draw on a Wells Fargo account belonging to "J.R. Marketing, Inc./James R. Thomas" at a post office in Culver City, California.

COUNT	DATE	ACT
THREE	7/2/18	Presented to USPS as payment for goods and services a counterfeit check in the amount of approximately \$506.70 that purported to draw on a Wells Fargo account belonging to "J.R. Marketing, Inc./James R. Thomas" at a post office in Los Angeles, California.
FOUR	7/3/18	Presented to USPS as payment for goods and services a counterfeit check in the amount of approximately \$1,306.70 that purported to draw on a Wells Fargo account belonging to "J.R. Marketing, Inc./James R. Thomas" at a post office in Pasadena, California.
FIVE	7/3/18	Presented to USPS as payment for goods and services a counterfeit check in the amount of approximately \$806.70 that purported to draw on a Wells Fargo account belonging to "J.R. Marketing, Inc./James R. Thomas" at a post office in Pasadena, California.
SIX	9/4/18	Presented to USPS as payment for goods a counterfeit check in the amount of approximately \$750 that purported to draw on a U.S. Bank account belonging to "BT Marketing Management Inc/Brian Conn" at a post office in Los Osos, California.

COUNTS SEVEN THROUGH ELEVEN

[18 U.S.C. § 641]

On or about the dates set forth below, in Los Angeles County, within the Central District of California, defendant JASON MACDONALD, also known as "Brian Conn," "Brandon Tartaglia," and "James R. Thomas," knowingly and willfully stole, purloined, and converted to his own use property and a thing of value of the United States Postal Service ("USPS"), a department and agency of the United States, having a value in the aggregate in excess of \$1,000, namely, USPS services and postage stamps, in the following approximate amounts, from the following locations, to which defendant MACDONALD knew that he was not entitled, with the intent to deprive the USPS of the use and benefit of that property and things of value:

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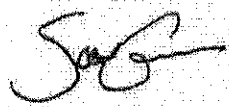
COUNT	DATE	LOCATION	AMOUNT
SEVEN	6/28/18	Los Angeles, California	\$1,356.70
EIGHT	7/2/18	Culver City, California	\$1,006.70
NINE	7/2/18	Los Angeles, California	\$506.70
TEN	7/3/18	Pasadena, California	\$1,306.70
ELEVEN	7/3/18	Pasadena, California	\$806.70

A TRUE BILL

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Foreperson

NICOLA T. HANNA
United States Attorney

BRANDON D. FOX
Assistant United States Attorney
Chief, Criminal Division


SCOTT M. GARRINGER
Assistant United States Attorney
Deputy Chief, Criminal Division

SHAWN J. NELSON
Assistant United States Attorney
Deputy Chief, General Crimes
Section

CAROLYN S. SMALL
Assistant United States Attorney
Major Frauds Section